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April 20, 2023

The Honorable Dora L. Irizarry United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States of America v. Dairo Antonio Usuga-David, 14 CR 625 (DLI)

Your Honor:

I write to ask that the sentence hearing in this case be adjourned until August 7 or 8, 2023. The bases for this application are that we (defense counsel) and the defendant need some additional time in order to provide the Probation Department with a complete set of documents that are needed for her preparation of the Presentence Investigation Report (PSR). Because the defendant is living under Special Administrative Measures in the Bureau of Prisons this process is made more complicated than normal. Based upon defense counsel's conversations with Probation and the Government, we believe that an additional 30 days will be sufficient. As such, we ask that all deadlines for preparation of the PSR and submission of sentencing memoranda be moved back about 30 days from the current schedule, and that the sentence be scheduled for August 7 or 8, 2023.

The Government does not oppose this application.

Thank you for your attention to this case.

Very truly yours,

Alexei Schacht

cc: All counsel of record by ECF